

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE

Joseph Gentle Moose Blake,
Plaintiff,

CIVIL ACTION NO.
2006 MAR 24 P 3:36

v.

Robert Murphy,
Kathleen Dennehy,
Massachusetts Department of Corrections,
Defendants.

U.S. DISTRICT COUR;
DISTRICT OF MASS.

AFFIDAVIT IN SUPPORT OF THE PLAINTIFF'S
MOTION FOR THE APPOINTMENT OF COUNSEL

Joseph Gentle Moose Blake, deposes and says:

1. I am a plaintiff in the above entitled case. I make this affidavit in support of the motion for the appointment of counsel.

2. The defendants are administrative staff members directly responsible for the plaintiff's conditions of confinement.

3. The defendants have, since the filing of this action, acted to further harass the plaintiff and hinder the exercise of his religious beliefs.

4. This is a complex case because it contains several different legal claims, involving several different defendants.

5. This case will require discovery of documents from various sources and the depositions of a number of witnesses, some of which are beyond the reach of the plaintiff.

6. The plaintiff has no legal education.

7. The plaintiff is being held in a facility which allows him very limited access to the law library.

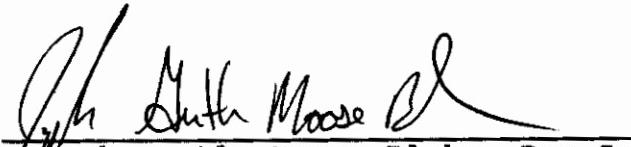
8. The defendants have demanded a trial by jury.

9. As set forth in the Memorandum of Law submitted with this motion, these facts, along with legal merit of the plaintiff's claims, support the appointment of counsel to represent the plaintiff.

WHEREFORE, the plaintiff's motion for appointment of counsel should

(2)

be granted.


Joseph Gentle Moose Blake, Pro Se
Mass. Treatment Center
30 Administration Rd.
Bridgewater, MA 02324

VERIFICATION

I, Joseph Gentle Moose Blake, state under the pains and penalties of perjury that I have made all of the above factual allegations in the foregoing affidavit as true and correct, with personal knowledge and observation.

DATED: 3/22/06


Joseph Gentle Moose Blake

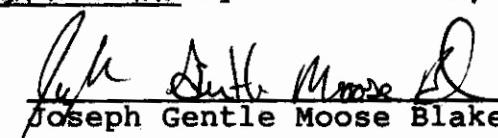
CERTIFICATE OF SERVICE

I, Joseph Gentle Moose Blake, certify under the pains and penalties of perjury that I have caused to be served:

1. Motion for the Appointment of Counsel;
2. Affidavit in Support of the plaintiff's Motion for the Appointment of Counsel; and
3. Memorandum of Law in Support of the plaintiff's Motion for the Appointment of Counsel,

upon Brian P. Mansfield, counsel for the defendants at 30 Admin. Rd. Bridgewater, MA by intra-institutional mail. by First Class, Postage Prepaid, mail.

DATED: 3/22/06


Joseph Gentle Moose Blake